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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT BOMAN,

Defendant.

No. CR 2:18-759(A)-JLS-2

TRIAL STIPULATION NO. 1
(FOUNDATION, AUTHENTICITY, AND
PREADMIT GOVERNMENT EXHIBITS)

Trial Date: February 25, 2025
Trial Time: 9:00 a.m.
Location: Courtroom of the
Hon. Josephine L.
Staton

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorneys Kathrynne N.
Seiden and Anna P. Boylan, and defendant Robert Boman, by and through
his counsel of record, Peter Swarth, hereby agree and stipulate to
the following facts, which the parties agree and stipulate may be
entered into evidence at trial and read to and shown to the jury at
any time for any purpose, unless otherwise ordered by the Court.

TRIAL STIPULATION NO. 1: EXHIBITS

1. The below records are true and accurate copies of the items they purport to be.

2. Defendant does not object on authenticity or foundational grounds to admission of these records at trial.

3. Defendant agrees to pre-admission of these records under Federal Rules of Evidence 902(11), 902(13), and 803(6), subject only to objections under Federal Rules of Evidence 401 and 403.

4. By this stipulation, without waiving the objections expressed herein, the parties request that the Court issue the proposed order filed concurrently herewith.

| Entity | Document(s) to Be Admitted and Bates Number(s) and Date of Production | Bates Number(s) of Custodian Declarations and Date of Production |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| Facebook, Inc. ¹ | Facebook account (identification number 100015952330065) with display name "ben.goyimprideworldwide.5" attributed to "Ben Goyimpridworldwide" (BOMAN_00000204) Produced on February 7, 2025 | BOMAN_00000205 Produced on February 7, 2025 |

¹ At the time, these records were owned by Facebook, Inc., which has been subsequently purchased by Meta Platforms, Inc.

| Entity | Document(s) to Be Admitted and Bates Number(s) and Date of Production | Bates Number(s) of Custodian Declarations and Date of Production |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| Twitter ² | Twitter account number 950407121790697472 with display name "RiseAboveMvmt" (BOMAN_00000278) Produced on February 7, 2025 | BOMAN_00000279- BOMAN_00000280 Produced on February 7, 2025 |
| JP Morgan Chase Bank, N.A. | Chase Account Number -5716 attributed to "Robert Rundo" Produced on February 7, 2025 | BOMAN_00000201- BOMAN_00000202 Produced on February 7, 2025 |
| Facebook, Inc. | Facebook account (identification number 10001460804631) with display name "ben.daley.16" attributed to "Ben Daley" (BOMAN_00000281) Produced on February 14, 2025 | BOMAN_00000284 Produced on February 14, 2025 |
| PayPal Holdings, Inc. | PayPal accounts (identification 1986308093686676284 and 1640630840449857332) attributed to "Ben Daley" (BOMAN_00000323) Produced on February 14, 2025 | BOMAN_00000324- BOMAN_00000325 Produced on February 14, 2025 |

² Twitter changed its name to X, Corp. in 2023.

1 IT IS SO STIPULATED.

2 Dated: February 18, 2025 Respectfully submitted,

3 JOSEPH T. MCNALLY
4 Acting United States Attorney

5 DAVID T. RYAN
6 Assistant United States Attorney
7 Chief, National Security Division

8 /s/

9 ANNA P. BOYLAN
10 KATHRYNNE N. SEIDEN
11 Assistant United States Attorneys

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA

14 /s/*

15 Dated: February 18, 2025

16 PETER SWARTH
17 Attorney for Defendant
18 ROBERT BOMAN

19 **signed pursuant to e-mail authorization*
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